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**UNITED STATES OF AMERICA
COMMONWEALTH OF PUERTO RICO
FEDERAL COURT**

[Clerk's Office
"Received and Filed"
date stamp]

Arroyo Muñiz, Jonathan
Plaintiff

VS.

The State
Police of Puerto Rico
Defendants

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Re: Civil Rights
Violations

Police Brutality

14-1308 JAF

PRO SE COMPLAINT

To the Honorable Court:

During the year two thousand thirteen the Puerto Rico Police violated my Civil Rights and assaulted me, then they put the handcuffs on me so tight that I ended up being disabled with medical treatment in the wrists area. For around a year I have been taking medications for the condition and inflammation and pain. I received medical attention at the Cima [sic] Hospital and later with Dr. Juan Liceaga, general practitioner.

On 3/8/2013 Dr. Glorimar evaluated me and referred me for a test, therapy and an orthopedist, referred to physiatrist Dr. Oscar Vargas, hand surgeon, patient with writs trauma.

Refers weakness, numbness, and weakness in both hands. Referred to Physiatrist Dr. Joanne González for needle test from which the

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computerized results were: pinched nerves, carpal tunnel. Referred for ten physical therapies and nerve conduction test.

Prescription by Centro Médicos [sic] del Oeste.

- Celebrex, Norflex and Neovol

10-01-2013: initial physical therapy evaluation.

Medical diagnosis: pain in both hands.

Incident data, patient had handcuffs placed on him after this he has had swollen hands and the pain started, numbness in hands.

Pain area: Wrists.

Activities that exacerbate it: driving, carrying objects, has difficulty holding objects, opening jars, etc.

11-6-2013: Dr. Pedro Castillo.

Evaluation: referred to specialist. New condition, electromyography in both hands, upper extremities, repetition of medications due to pain, weakness, radial deviation in left wrist. The physical examination presents limitations when opening and closing both hands.

01-07-2014: Electrodiagnostic Test

Neuropathy due to nerve trapping, pinched, carpal tunnel. Received twelve therapies for his hands but has not improved.

Impression, Diagnosis: Carpal Tunnel Syndrome.

Treatment: Arterial and extremities Dopplex for which I am disabled. I have been receiving treatment for a year and therefore have not been able to perform and work. Economic losses are many and I cannot do nearly any

kind of work. I do not qualify for Social Security because of the scoring and the condition is permanent, therefore I am making a claim against the state for the condition of 13 million dollars.

I was stopped while I was driving. Later on a vehicle came headed towards me, and another one crashed against my car. The policeman who got down pointed at me with a revolver. When I raised my hands right away one of the policemen opened the car door. With my hands up, over my head, they started to hit me. Then they smashed me against the car and put the handcuffs on me. When I told them they were tight, Waldonar Estrada, a policeman, came towards me and yelled "they are tight" and tightened the handcuffs even more. Then he tightened the other one. When I told them about the pain they threw me against the police car. Inside the policeman was going at 70 to 80 miles [per hour], hitting my head against the seat. When we arrived at the station I told him the handcuffs were too tight, which he did not loosen. Later on they sat

me down in the supervisor's office. When they started to push me I told supervisor Hernández that the handcuffs were too tight. He did not loosen them, in spite of my asking him several times to loosen the handcuffs. They [sic] were swollen when they proceeded to lock me in a cell with the handcuffs still on.

I spent a lot more time inside the cell with the handcuffs on. When the duty sergeant came in he pushed me almost dizzy [sic]. When he saw the handcuffs, he released them, touched my testicles, told me to take off my pants and shoes. I was not allowed to make a call to my lawyer, they did not want to let me go. I was there approximately until 8:00 when my parents arrived, the police notified them.

When I gave them their number they started to fabricate traffic tickets. The duty sergeant who was there prepared them. Another one said "let's stamp them" and [they] put some other supposed offenses on them. Then they confiscated the car for more than 3 months. They fabricated a case against me that did not go forward. Later I had to pay some fines under threat and coercion. The fact that I may have committed some traffic violations does not justify the aggression and the violation to my civil rights, for which I am claiming 13 million dollars for the disability and violation of rights.

The policemen involved were: Rafael Chávez (Badge 26-70-04), Waldemar Estrada (Badge 28-378), Noel Cabán, Sergeant Hernández, among others, Melitza Escalera (Badge 29-931).

Under these circumstances, the defendant [sic] is disabled, receiving medical treatment, and unable to do his work because of the condition. Therefore we ask that this be processed and that Law 9 Art. 1983, State's Negligence, be applied.

Given in Hato Rey, Puerto Rico.

[Signature]

Jonathan Arroyo Pro Se
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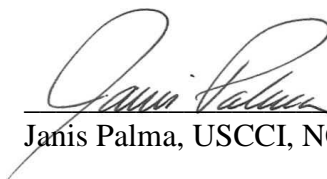
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CERTIFICATION BY TRANSLATOR

I, JANIS PALMA, an English-Spanish interpreter and translator certified to that effect by the Administrative Office of the United States Courts and the National Association of Judiciary Interpreters and Translators (NAJIT) respectively, do hereby certify that I have translated the foregoing document and it is a true and accurate translation to the best of my knowledge and ability.



Janis Palma, USCCI, NCJIT-S

April 28, 2014
Date